

I fully concur with the comments of the ARRL in this matter. FRS type operation in this band cannot be done without a spectrum reallocation proceeding first. Further, it is not appropriate in this portion of the 446 MHz amateur spectrum as it is heavily used for simplex FM operations by hundreds of thousands of amateurs in the US. Inevitable conflict would result between European visitors and US hams, unless hams were prevented from using the spectrum, which would mean revocation of that spectrum from the amateur service, again, requiring a new rule-making to modify spectrum allocation.

Sincerely,  
Richard L. Tannehill, P.E.  
W7RT